CHECKLIST ENVIRONMENTAL ASSESMENT

Proposed Action: Approve Drilling Permit (Form 22)

Project/Well Name: Unit MC 34-9NH **Operator:** Denbury Onshore, LLC

Location: SW SE Section 9 T11N R57E

County: Wibaux MT; Field (or Wildcat): Pine

Proposed Project Date: 01/07/2019

I. DESCRIPTION OF ACTION

Denbury plans to drill a horizontal oil well in the Mission Canyon formation, 12,469' MD / 7,528' TVD. Surface casing to be set at 2,000' and cemented back to surface.

II. PROJECT DEVELOPMENT

1. PUBLIC INVOLVEMENT, AGENCIES, GROUPS OR INDIVIDUALS CONTACTED

Montana Bureau of Mines and Geology, GWIC website (Wibaux County Wells).

US Fish and Wildlife, Region 6 website ENDANGERED, THREATENED, PROPOSED AND CANDIDATE SPECIES MONTANA COUNTIES, Wibaux County

Montana Natural Heritage Program Website (FWP) Heritage State Rank= S1, S2, S3, T11N R57E

Montana Cadastral Website

Surface Ownership and surface use Section 9 T11N R57E

Montana Department of Natural Resources MEPA Submittal

2. ALTERNATIVES CONSIDERED

No Action Alternative: The proposed well would not be drilled.

Action Alternative: Denbury Onshore, LLC would have permission to drill the well.

III. IMPACTS ON THE PHYSICAL ENVIRONMENT

3. AIR QUALITY

Long drilling time: No, 15-20 days drilling time.

Unusually deep drilling (high horsepower rig): No, triple drilling rig for a 12,469' MD / 7,528' TVD, directional well. The objective formation is Mission Canyon.

Possible H2S gas production: Yes, possible H2S gas from the Mississippian formations.

In/near Class I air quality area: No.

Air quality permit for flaring/venting (if productive): Yes, DEQ air quality permit required under 75-2-211. AQB review.

Comments: No special concerns – using rig to drill to 12,469' MD / 7,528' TVD. If there are not any gas gathering systems nearby, associated gas can be flared under Board Rule 36.22.1220.

4. WATER QUALITY

Salt/oil based mud: Use freshwater and freshwater mud system for drilling surface hole (Rule 36.22.1001) and intermediate hole will utilize oil based invert mud, drilling across the production interval will utilize a brine system.

High water table: No high-water table anticipated at this location.

Surface drainage leads to live water: No, closest drainage is an unnamed ephemeral drainage about 3/10 of a mile to the south. Cabin Creek is 2.5 miles to the south.

Water well contamination: No water wells within a ½ mile radius.

Porous/permeable soils: No, sandy clay soils.

Class I stream drainage: No.

Groundwater vulnerability area: No.

Mitigation:

- __ Lined reserve pit
- ___ Adequate surface casing
- ___ Berms/dykes, re-routed drainage
- X Closed mud system
- X Off-site disposal of **solids**/liquids (in approved facility)

Comments: Steel surface casing will be run and cemented to surface to protect ground water. (Rule 36.22.1001).

5. SOILS/VEGETATION/LAND USE

Vegetation: Grassland.

Steam crossings: None anticipated.

High erosion potential: No, a small cut of 15.8' and a small fill of 10.1' is required.

Loss of soil productivity: None, location to be restored after drilling well, if well is nonproductive.

Unusually large wellsite (Describe dimensions): No, a large location will be used, 350' X 400'.

Damage to improvements: Slight, surface use is grazing land.

Conflict with existing land use/values: Slight

Mitigation

- __ Avoid improvements (topographic tolerance)
- __ Exception location requested
- X Stockpile topsoil
- __ Stream Crossing Permit (other agency review)
- X Reclaim unused part of wellsite if productive
- ___ Special construction methods to enhance reclamation

Access Road: Access will be off existing road and 219' of new road will be built into location.

Drilling fluids/solids: This is a closed loop system. All cuttings will be collected in temporary metal pits and then hauled to a licensed disposal facility.

6. HEALTH HAZARDS/NOISE

Proximity to public facilities/residences: No residences within ½ mile radius. Plevna, MT is located about 20 miles to the south.

Possibility of H2S: Yes, possible H2S gas from the Mississippian formations.

In/near Class I air quality area:

Size of rig/length of drilling time: 15-20 days drilling time.

Mitigation:

- X Proper BOP equipment
- __ Topographic sound barriers
- __ H2S contingency and/or evacuation plan
- __ Special equipment/procedures requirements
- Other:

7. WILDLIFE/RECREATION

Sage Grouse: In general area. Program received 12-12-18.

Proximity to sensitive wildlife areas (DFWP identified): in Sage-Grouse General habitat.

Proximity to recreation sites: None.

Creation of new access to wildlife habitat: None. Conflict with game range/refuge management: None. Threatened or endangered Species: Species identified as threatened or endangered are the Species identified as threatened or endangered are the Whooping Crane, Pallid Sturgeon, Interior Least Tern, Northern Long-eared Bat, and Piping Plover. MTFWP Natural Heritage Tracker website lists four (4) species of concern. They are the Greater Sage-Grouse, Golden Eagle, Black-billed Cuckoo, and the Redheaded Woodpecker.

Mitigation:
Avoidance (topographic tolerance/exception)
X Other agency review (DFWP, federal agencies, DNRC Trust Lands, Sage Grouse Habitat
Conservation Program)
Screening/fencing of pits, drillsite
X Other: Sage Grouse Habitat Conservation Program to limit work times.
Comments: Private cultivated surface lands. There may be species of concern that maybe impacted by
this wellsite. We ask the operator to consult with the surface owner as to what he would like done, if a

IV. IMPACTS ON THE HUMAN POPULATION

species of concern is discovered at this location. The Board of Oil & Gas has no jurisdiction over private

8. HISTORICAL/CULTURAL/PALEONTOLOGICAL

surface lands. No concerns.

Proxii	nity to known sites: None.
	Mitigation avoidance (topographic tolerance, location exception)other agency review (SHPO, DNRC Trust Lands, federal agencies)
Other	
9.	SOCIAL/ECONOMIC
C14	antial affect on too base

Substantial effect on tax base

__ Create demand for new governmental services
__ Population increase or relocation
Comments: No concerns.

IV. SUMMARY

No long term impacts expected. Some short term impacts will occur, but can be mitigated. I conclude that the approval of the subject Notice of Intent to Drill (does/<u>does not</u>) constitute a major action of state government significantly affecting the quality of the human environment, and (does/<u>does not</u>) require the preparation of an environmental impact statement.

EA Checklist	Name:	John Gizicki	Date:	12/18/18
Prepared By:	Title:	Compliance Specialist		